

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LINDA FLINT EDGE,
Plaintiff,

v.

NORFOLK FINANCIAL CORPORATION
and DANIEL W. GOLDSTONE,
Defendants.

No. 04-12134 DPW

**PLAINTIFF'S MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS OR, ALTERNATIVELY FOR SUMMARY JUDGMENT**

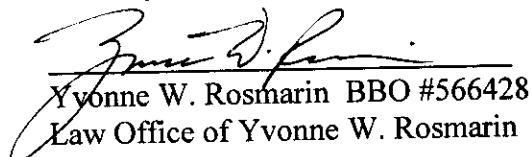
Plaintiff respectfully requests that the Court permit her to file her Response to Defendants' Motion to Dismiss or, Alternatively, for Summary Judgment on or before December 22, 2004. In support of this Motion, Plaintiff states as follows:

1. On November 23, 2004, Defendants filed their Motion to Dismiss or, Alternatively, for Summary Judgment.
2. Due to the intervening Thanksgiving holiday, Plaintiff did not receive Defendants' motion until November 29, 2004.
3. According to Local Rule 7.1(B)(2), Plaintiff's response would normally be due on December 7, 2004.
4. Defendants' motion is a dispositive motion – to dismiss, or, alternatively for summary judgment – and is accompanied by two affidavits and exhibits. Plaintiff will need additional time to obtain needed affidavits in order to respond to Defendants' motion and affidavits.
5. Plaintiff's counsel has a number of other matters with deadlines within the first half of December, 2004.

6. Plaintiff's counsel requested assent from Defendants' counsel for this motion. However, Defendants' counsel would agree to allow Plaintiff only until December 15 to file her response to Defendants' motion, which is not sufficient time. Defendants' counsel represented to Plaintiff's counsel that he could not agree to a December 22, 2004 extension of time because his client did not wish him to extend the response time at all.

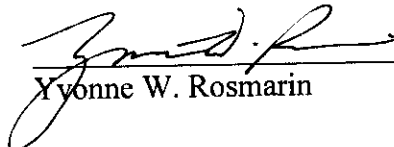
WHEREFORE, Plaintiff respectfully requests that this Court extend the time for filing her Response to Defendants' Motion to Dismiss or, Alternatively, for Summary Judgment and permit her to file her Response on or before December 22, 2004.

Respectfully submitted,
Attorney for the Plaintiff


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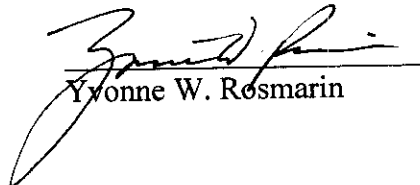
CERTIFICATE OF COMPLIANCE WITH LR 7.1(A)(2)

I hereby certify that, pursuant to Local Rule 7.1(a)(2), plaintiff's counsel telephoned defendants' counsel on December 2, 2004 and spoke with him on December 3, 2004 to attempt in good faith to reach agreement on this motion.


Yvonne W. Rosmarin

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by First Class United States mail on Dec. 3, 2004.


Yvonne W. Rosmarin